

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

ALEK SCHOTT

*Plaintiff,*

v.

JOEL BABB, in his individual and official capacity; MARTIN A. MOLINA III, in his individual and official capacity; JAVIER SALAZAR, in his individual and official capacity; and BEXAR COUNTY, TEXAS,

*Defendants.*

Civil Action No. 5:23-cv-00706-OLG-RBF

**AGREED MOTION FOR ENTRY OF  
CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiff Alek Schott moves for entry of the proposed confidentiality and protective order accompanying this motion (Proposed Order). Alek's counsel conferred with Defendants' counsel to tailor the form protective order from this Court's local rules to the needs of this case. Defendants consent to this motion and to the entry of the Proposed Order. Among other things, the Proposed Order will facilitate discovery and promote the resolution of discovery disputes. Alek therefore respectfully requests that the Court enter the Proposed Order.

Dated: January 18, 2024

Respectfully submitted,

/s/ Christen M. Hebert

**Christen M. Hebert**

(TX Bar No. 24099898)

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*Attorneys for Plaintiff*

*\*Admitted Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 18, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which provided electronic service upon all attorneys of record.

/s/ Christen Mason Hebert  
Christen Mason Hebert

*Attorney for Plaintiff*